

JASHAI LUCAS
3135 OAKFORD AVE
BALTIMORE, MD 21215

and

JASHAI LUCAS (*on behalf of minor child*
[REDACTED] *hi* [REDACTED])
3135 OAKFORD AVE
BALTIMORE, MD 21215
Plaintiffs

V.

BALTIMORE COUNTY, MARYLAND
Legal Department, Room 219
400 Washington, Ave
Towson, Maryland 21204

Serve On: James R. Benjamin Jr.
Historic Courthouse
400 Washington, Ave
Towson, Maryland 21204

And

DERYCK LEE
700 E. JOPPA ROAD
TOWSON, MARYLAND 21286
Defendants

* IN THE
* CIRCUIT COURT
* OF
* MARYLAND
* FOR
* BALTIMORE CITY
* CASE NO.: _____

* * * * *

COMPLAINT

Plaintiffs Jashai Lucas and Jashai Lucas (on behalf of minor child [REDACTED] *hi* [REDACTED]) (hereinafter referred to as "Plaintiffs"), by and through their attorneys, Brandon C. James, Esq., and the James Legal Group, LLC, hereby files suit against Defendants Baltimore County, Maryland and Deryck Lee (hereinafter referred to as "Defendants") and, in support thereof, states as follows:

1. Plaintiffs are now, and at all times relevant to this suit, a residents of Baltimore City, Maryland.

2. Defendant Baltimore County, Maryland ("Baltimore County"), is a government entity located in Maryland.

3. Defendant Lee is a resident of Parkville Maryland and an employee of Defendant Baltimore County.

4. On March 23, 2024, at approximately 8:20 p.m., Plaintiff Jashai Lucas was operating a motor vehicle with passenger [REDACTED] [REDACTED]s traveling in a safe and responsible manner, traveling westbound on Rogers Avenue in Baltimore City.

5. At the aforementioned date and time, Defendant Lee, was driving a motor vehicle owned by Defendant Baltimore County eastbound on Park Heights Ave in Baltimore City.

6. As Plaintiff Lucas made a left hand turn onto Park Heights, Defendant Lee attempted to turn into a parking lot which cut of Plaintiff Lucas' lane of travel. Because Defendant Lee attempted to make a left handed turn without ensuring he could do so safely, he caused Plaintiff's vehicle to collide with his and caused significant damage.

7. Plaintiff provided notice to Baltimore County pursuant to State Government 5-301.

**COUNT I – PLAINTIFFS V DERYCK LEE
(Negligence)**

8. The allegations of fact hereinabove and below are set forth, adopted herein, and made a part hereof, and further,

9. Defendant Lee owed a duty to operate his vehicle in a safe and responsible manner, but negligently breached that duty by:

- a) failing to maintain a reasonable proper rate of speed;
- b) failing to maintain proper control of his vehicle;
- c) failing to keep a proper lookout;
- d) failing to keep apprised of road and traffic conditions;
- e) failing to obey the stop sign and/or traffic signal;

f) failing to take steps necessary to avoid the collision; and
g) in other respects, presently unknown to Plaintiff, but which may become known prior to or at the time of trial.

10. As the direct and proximate result of Defendant's aforesaid negligence, Plaintiffs suffered serious physical injury, pain and mental distress, and property damage. Plaintiffs sustained serious and, perhaps permanent injuries in and about his head, back, body, and limbs. Plaintiff was further caused to undergo extensive medical treatment for the care of said injuries.

12. All of Plaintiff's stated injuries, damages and losses, past, present, and perspective, were caused solely by the negligence of the Defendant, with no negligence or want of due care on the part of the Plaintiff contributing thereto.

**Count II – PLAINTIFFS V BALTIMORE COUNTY
(Respondeat Superior)**

12. Plaintiff incorporates by reference every foregoing paragraph as if fully herein.

13. Defendant Lee was an employee of Baltimore County on the date of the incident.

14. Defendant Lee committed these acts within the scope of his employment with Baltimore County.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, in an amount exceeding Seventy Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

Respectfully Submitted,

The James Legal Group, LLC

_____/s/_____
Brandon C. James, Esq.
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Phone: (410) 504-2274
E-mail: bjames@jameslegalgroup.org
Attorney for Plaintiffs

DEMAND FOR JURY TRIAL

Plaintiff does hereby demand a trial by jury on all counts.

Respectfully Submitted,

The James Legal Group, LLC

_____/s/_____
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Attorney for Plaintiff